UNITED STATES DISTRICT COURT DISTRICT OF SOUTH CAROLINA SPARTANBURG DIVISION

JANE DOES 1-9,

Case No.: 7:20-cv-00947-JD

Plaintiffs,

VS.

CONSENT MOTION FOR EXTENSION OF TIME

COLLINS MURPHY, LIMESTONE COLLEGE, MG FREESITES, LTD., d/b/a PORNHUB.COM, and HAMMY MEDIA LTD. d/b/a XHAMSTER.COM.

Defendants.

Plaintiffs, by and through their undersigned counsel, and pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure move the Court for an order extending the time within which the Plaintiff may file a response to Defendant's Motion to Dismiss. (See Dkt. No. 104).

This extension is being sought in good faith, for a proper purpose, and is not intended to unduly or unnecessarily delay these proceedings. Upon conferring, counsel for the Defendant consents to allow Plaintiff to extend the time to file a Response by (14) fourteen days. The current due date is February 24, 2021. The new due date would be March 10, 2021.

This motion is based upon the pleadings filed in this case, rules of Court, and such other matters as may be properly presented to the Court. In accordance with Local Civil Rule 7.04, a full explanation of the motion is contained within this motion and a memorandum will serve no useful purpose.

WHEREFORE, the Plaintiff, respectfully requests this Court grant Plaintiff's Motion and enter an order extending the time in which he may file a Response by an additional fourteen (14) days.

WE SO MOVE:

/s/ J. Edward Bell, III

J. Edward Bell, III (#1280) Joshua M. W. Salley (#13214)

BELL LEGAL GROUP, LLC

219 North Ridge Street

Georgetown, SC 29440

Telephone: (843) 546-2408

jeb@edbelllaw.com

jsalley@edbelllaw.com

Counsel for Plaintiffs

Tyler S. Thompson (admitted *Pro Hac Vice*)

Liz J. Shepherd (admitted *Pro Hac Vice*)

Jordan A. Stanton (admitted *Pro Hac Vice*)

DOLT, THOMPSON, SHEPHERD & CONWAY, PSC

13800 Lake Point Circle

Louisville, KY 40223

Telephone: (502) 244-7772

tthompson@kytrial.com

lshepherd@kytrial.com

jstanton@kytrial.com

Counsel for Plaintiffs

WE CONSENT:

/s/ R. Taylor Speer (with permission)

R. Taylor Speer

J. Kenneth Carter

TURNER, PADGET, GRAHAM AND LANEY, P.A.

P.O. Box 1509

Greenville, SC 29602

Telephone: (864) 552-4600

tspeer@turnerpadget.com

kcarter@turnerpadget.com

Counsel for Defendant, MG

Freesites, Ltd.

Marc E. Mayer | Attorney ID: pro hac vice

email | mem@msk.com

direct | 310-312-3154

2049 Century Park East

18th Floor

Los Angeles, California 90067

facsimile | 864-282-5993